



May 30, 2023

Via ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

*Re: In re: New York City Policing During Summer 2020 Demonstrations,
No. 20-CV-8924
This Filing is Related to All Cases*

Dear Judge Gorenstein:

We represent the Plaintiffs in *Payne* and write respectfully on behalf of all non-stayed cases further to our letter dated May 25, 2023 requesting a conference to compel the deposition of Chief Kenneth Lehr before June 14. *See* ECF 1014. On May 30, Defendants confirmed that they will produce Chief Lehr for a deposition on Tuesday, June 13 and will produce his responsive text messages by June 6. Accordingly, Plaintiffs withdraw their letter motion at ECF 1014.

Thank you for your time and consideration of this matter.

Respectfully submitted,

NEW YORK CIVIL LIBERTIES UNION
FOUNDATION

By: s/Molly K. Biklen

Molly K. Biklen
Jessica Perry
Daniel R. Lambright
Robert Hodgson
Veronica Salama
Lisa Laplace
Christopher T. Dunn
125 Broad Street, 19th Floor
New York, NY 10004
(212) 607-3300
jperry@nyclu.org
mbiklen@nyclu.org
dlambright@nyclu.org
rhodgson@nyclu.org
llaplace@nyclu.org
cdunn@nyclu.org

THE LEGAL AID SOCIETY

By: s/ Corey Stoughton

Corey Stoughton
Jennvine Wong
Rigodis Appling
Paula Garcia-Salazar
199 Water Street
New York, NY 10038
(212) 577-3367
cstoughton@legal-aid.org
jwong@legal-aid.org
rappling@legal-aid.org

Attorneys for the Payne Plaintiffs

Cc: All counsel of record by ECF